

**IN THE UNITED STATES PATENT & TRADEMARK OFFICE
BOARD OF PATENT APPEALS AND INTERFERENCES**

APPELLANT:	Klaus Kursawe)	
)	Group Art Unit: 3693
)	
SERIAL NUMBER:	09/683,972)	Examiner:
)	Kirsten S. Apple
FILED:	March 7, 2002)	
)	
FOR:	METHOD FOR CREDIT CARD)	Confirmation No. 9293
	NOTIFICATION)	
)	

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY BRIEF

In response to the Examiner's Answer mailed August 13, 2007, the Applicant submits the following reply as follows:

ARGUMENT

Claims 1, 2, 4-7, and 9-20 are current pending in the instant application. The Appellant submits this Reply in response to the Examiner's Answer dated August 13, 2007. On page 6 of the Examiner's answer, the Examiner states as follows:

"The appellant is correct that the examiner's interpretation that 'rules' of Camacho reads on applicants 'parameters.' The argument from the appellant that the(sic) 'the only actual value (a) and parameters disclosed here in Camacho et al. relate directly to authentication of the requesting party' (Appeal Brief, March 7, 2002(sic) page 7, line 16-18) not only is incorrect it is irrelevant."

The Appellant strongly disagrees on both counts and submits that the Examiner has mischaracterized the teachings of Camacho with respect to the feature recited in claims 1, 11, 12, and 13, *inter alia*, "comparing an actual value (a) with a preset parameter at an account server, the preset parameter ***defined by the account holder***." Under the Examiner's interpretation of Camacho with respect to Appellant's claims 1, 11, 12, and 13, the parameters (rules), which include the business-filtering rules (page 4, paragraph 42, line 5) and the company level rules (page 4, paragraph 42, line 16) ***would be defined by the consumer*** (e.g., consumer client 102a, Figure 2). However, as Camacho discloses services provided to consumers for "reducing transaction-based fraud where the requesting individual is not known, or physically present, to provide identification" (paragraph [0013]), it is illogical to suggest that these fraud protection services would then enable the consumer to predefine the business rules and company level rules that implement these fraud protection services, as implied by the Examiner. In fact, it is clear that the teachings of Camacho do not provide for a consumer to define the business and company-level rules (e.g., in Figures 2 and 3, the filter manager 208, the transaction rules manager 212, and the authentication manager 216 all reside in the PDI system 100). It is evident from at least the illustration in Figure 2 that these rules engines are not within control of the consumer client 102a. For at least these reasons, the Appellant submits that clear error exists in the rejections of claims 1, 11, 12, and 13.

CONCLUSION

In view of the foregoing, it is urged that the final rejection of claims 1, 2, 4-7, and 9-20 be overturned. The final rejection is in error and should be reversed. If there are any additional charges with respect to this Reply Brief, or otherwise, please charge them to Deposit Account No. 50-0510.

Respectfully submitted,

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